

UNITED STATES DISTRICT COURT

for the

Western District of Texas

Pecos Division

United States of America

v.

Ciro Aminadab CELAYA-Hernandez

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Case No. 4:22-mj-550*Defendant(s)*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 12, 2022 in the county of Brewster in the
WESTERN DISTRICT OF TEXAS , the defendant(s) violated:*Code Section*Defendant,
18 USC 1546

Defendant did knowingly forge, counterfeit, alter, or falsely make any immigrant or nonimmigrant visa, permit, border crossing card, alien registration receipt card, or other document prescribed by statute or regulation for entry into or as evidence of authorized stay or employment in the United States, or uttered, used, attempted to use, possessed, obtained, accepted, or received any such visa, permit, border crossing card, alien registration receipt card, or other document prescribed by statute or regulation for entry into or as evidence of authorized stay or employment in the United States, knowing it to be forged, counterfeited, altered, or falsely made, or to have been procured by means of any false claim or statement, or to have been otherwise procured by fraud or unlawfully obtained.

This criminal complaint is based on these facts:

 Continued on the attached sheet.

Complainant's signature

Border Patrol Agent Angela Ramos

Printed name and title



Judge's signature

Honorable Judge David B. Fannin

United States Magistrate Judge

Date: 05/16/2022City and state: Alpine, Texas

OATH TELEPHONICALLY SWORN
AT <u>9:00</u> A.M.
FED.R.CRIM.P. 4.1(b)(2)(A)

AFFIDAVIT

United States of America

v.

Defendant:

1) Ciro Aminadab CELAYA-Hernandez

On May 12, 2022, Border Patrol Agents (BPA) Kristen Miller, Arturo Gonzalez, Rafael Ortega, Abel Luevano, and Andrew Jones were assigned to the Highway 118 Checkpoint located approximately 15 miles south of Alpine, Texas. At approximately 11:25 p.m., a silver 2007 Jeep Cherokee, entered the primary inspection area of the checkpoint. The vehicle was driven by LANZA-Hernandez, Marjorie but at the time of inspection she provided a B1/B2 Visa with the name of MARTINEZ-Tinajero, Beatriz Yesenia. BPA Miller identified herself as a United States Border Patrol Agent and performed an immigration inspection of LANZA-Hernandez. All occupants handed BPA Luevano their Border Crossing Cards and BPA Miller advised LANZA-Hernandez to go to secondary for further inspection.

BPA Luevano and Jones ran records checks through Big Bend Sector Communications (KAK 900). Returns on the subjects' Border Crossing Cards came back negative and the I-94s that were presented all used the same registration number. The I-94 Form presented came back to a another individual not present at the checkpoint.

BPA Luevano began questioning the subjects about the documents presented. BPA Luevano also asked the subjects if they were illegally present in the United States. LANZA-Hernandez stated that the documents were false and that she was illegally present in the United States. BPA Luevano asked LANZA- Hernandez if the documents the other passengers presented were false as well, and she replied that they were also fictitious documents. The remaining subjects were also questioned as to their citizenship to which they stated that they were citizens of Mexico and illegally present in the United States. The remaining subjects were asked to step out of the vehicle and placed under arrest for being illegally present in the United States.

Ciro CELAYA-Hernandez was fingerprinted, and records checks revealed that he was a citizen of El Salvador and had no prior immigration history.

CELAYA-Hernandez was advised of his Miranda Rights by BPA Gonzalez and witnessed by BPA Luevano. He waived his rights and was willing to answer questions. He claimed to not know details about fees for the documents however, he stated he crossed the Rio Grande River with the other three subjects. After crossing, he was handed the false documents and told to get into the vehicle.



Border Patrol Agent

Sworn to and subscribed before me on this 16 day of May, 2022.



David B. Fannin
United States Magistrate Judge

CONTINUATION OF CRIMINAL COMPLAINT

Ciro Aminadab ZELAYA-Hernandez

FACTS (CONTINUED)

Immigration History:

NONE

Criminal History:

NONE